

STATE OF INDIANA
MARION COUNTY, ss:

IN THE MARION SUPERIOR COURT
CRIMINAL DIVISION

THE STATE OF INDIANA)

vs.)

Kimberly Jackson B/F 7/16/84
CAUSE NO. 49G051204FC023996
(AS TO COUNT(S) I, II, III,
IV, V)

INFORMATION

COUNT I

FORGERY, CLASS C FELONY I.C.
35-43-5-2

COUNT II

THEFT, CLASS D FELONY I.C. 35-
43-4-2

COUNT III

FORGERY, CLASS C FELONY I.C.
35-43-5-2

COUNT IV

FRAUD, CLASS D FELONY I.C. 35-
43-5-4

COUNT V

THEFT, CLASS D FELONY I.C. 35-
43-4-2

On this date, G. Dodson came before the Prosecuting Attorney of the Nineteenth Judicial Circuit and, being duly sworn (or having affirmed), stated that in Marion County, Indiana

COUNT I

Kimberly Jackson, on or about February 4, 2012, did, with intent to defraud, utter to an employee of Donato's Pizza a written instrument, that is: a check numbered 710, said instrument being of the following form:

DL# 536499-1417	
KATE L. REEDER CHARLES H. REEDER 7238 TOWNSHIP LINE RD. APT. A. INDIANAPOLIS, IN 46260-3760	710 70-2180/719 119
Pay to the Order of <u>Donato's Pizza</u>	<u>2-04-12</u> Date
<u>Thirty eight & 38/100</u>	\$ <u>38.38</u>
PNC BANK PNC Bank, N.A. 071 Indianapolis, IN	Dollars <input checked="" type="checkbox"/> <small>PAID BY DEPOSIT</small>
For _____	<u>Kate Reeder</u>
150719718912 12309091110 0210	

COUNT 1

DL# 536499-1417

KATE L. REEDER
CHARLES H. REEDER
7239 TOWNSHIP LINE RD.
APT. A.
INDIANAPOLIS, IN 46250-3758

710
70-2188718
119

2-04-12
Date

Pay to the Order of Donatos Pizza \$ 38.38
thirty eight & 38/100 Dollars

PNC BANK
PNC Bank, N.A. 071
Indianapolis, IN

For Kate Reeder

⑆071921891⑆ 4620909141⑆ 0710 ⑈0000003838⑈

67491508

a3026 a3026

RETURNS TO ECIT/000000

FIRST PREMIER BANK
400 S. Sycamore, Suite 101
Sioux Falls, SD 57110

> 091408938 <
CENTRALIZED RETURNS
1701414445
CYBR a3026
a3026 a3026

02/07/2012 10:20:20
0000718960 4802
FEB-7 2012

DEPOSIT ONLY

in such a manner that said instrument purported to have been made by the authority of Kate Reeder and/or Heatha Dixon, power of attorney, who did not give authority;

COUNT II

Kimberly Jackson, on or about February 4, 2012, did knowingly exert unauthorized control over the property, that is: United States currency, of PNC Bank, with intent to deprive PNC Bank of any part of the value or use of said property;

COUNT III

Kimberly Jackson, on or about September 22, 2011, did, with intent to defraud, make a written instrument, that is: a J.C. Penney credit card application, said instrument being of the following form:

made by another person, namely: Delores Jones;

COUNT IV

Kimberly Jackson, on or about September 22, 2011, did, with intent to defraud, obtain property, that is: clothing items, by

6500MFT	04/11/22 04:31:28 PM	VERIFY MODE	Production	INTRA	4:32 PM	4:10:31C
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using a credit card that was issued to another person, namely:
Delores Jones, without the consent of Delores Jones;

COUNT V

Kimberly Jackson, on or about December 6, 2011, did knowingly exert unauthorized control over the property, that is: United States currency, of Chase Bank, with intent to deprive Chase Bank of any part of the value or use of said property;

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

I swear or affirm under penalty of perjury as specified by I.C. 35-44-2-1 that the foregoing representations are true.


Affiant

4/13/2012
Date

TERRY R. CURRY
Marion County Prosecutor
19th Judicial Circuit


Deputy Prosecuting Attorney

State's Witnesses:

G. Dodson IMPD H2928
D. Shragal IMPD S8081
L. Rabensteine IMPD 31734
Kate Reeder
Heatha Dixon
Suzy Richards
Jerry Crowe
Bernard Perryman
PNC Bank
JP Morgan Chase Bank
J. Willison IMPD W4659
Charles Jones

Delores Jones
Linda Jones
Richard Lentz
Laura Benabides
Stuart Duvall-Jones
Kevin Sullivan
Ben Dillon
Ramona Burns
Kim Horton
Robin Bankhead, USPS
Kathy Walden , USPS
Terry Kowaski
J C Penney

AFFIDAVIT

FOR PROBABLE CAUSE

STATE OF INDIANA, COUNTY OF MARION, SS:

GUSTAVIA DODSON swears (affirms) that:

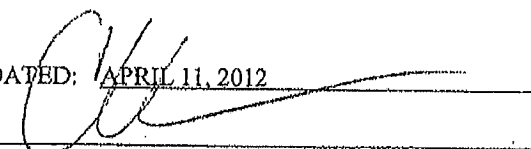
ON 2-27-2012 AT 4:18PM OFFICER RABENSTEINE OF IMPD WAS DISPATCHED TO 7238 TOWNSHIP LINE RD APT #A TO INVESTIGATE A REPORT OF FRAUD. UPON ARRIVAL HE SPOKE WITH THE VICTIM'S CAREGIVER, SUZY RICHARDS. MS. RICHARDS SAID THAT HER CLIENT, KATE REEDER B/F/95, HAS HAD 2 CHECKS AND HER PERSONAL INFORMATION STOLEN. MS. RICHARDS SAID THAT MS. REEDER'S NIECE, HEATHA DIXON, HAS POWER OF ATTORNEY OVER MS. REEDER. ON 2-20-2012 MS. DIXON WAS LOOKING AT MS. REEDER'S BANK STATEMENT AND NOTICED THAT A CHECK HAD BEEN CASHED FOR THE AMOUNT OF \$38.38 AT A DONATO'S PIZZA ON 2-4-2012. SHE CALLED MS. RICHARDS. AFTER LOOKING THROUGH MS. REEDER'S CHECKBOOK AND MS. RICHARDS DISCOVERED THAT 2 CHECKS WERE MISSING. THEY DID NOT HAVE A SUSPECT AT THIS TIME.

ON 2-21-2012 MS. REEDER RECEIVED A LETTER IN THE MAIL. THE LETTER SAID THAT SOMEONE HAD APPLIED FOR A FIRST NATIONAL BANK CREDIT CARD IN HER NAME WITH AN AUTHORIZED USER NAME KIMBERLY JACKSON. THE SUSPECT USED MS. REEDER'S SSN AND DOB TO OPEN UP THE ACCOUNT PER SENIOR CREDIT UNDERWRITER BERNARD PERRYMAN WITH FIRST NATIONAL BANK OF OMAHA. THE BILLING ADDRESS USED WAS 7325 E. 53RD STREET INDPLS, IN 46226. MS. RICHARDS CALLED THE PHONE NUMBER ON THE LETTER AND SHE WAS INFORMED THAT THE NAME ON THE APPLICATION WAS KIMBERLY JACKSON B/F/27 DOB: 7-16-84. MS. RICHARDS TOLD ME THAT KIMBERLY JACKSON HAD BEEN A CAREGIVER FOR MS. REEDER FROM 12-4-2011 TO 1-21-2012 THROUGH NURSEFINDERS OF INDIANAPOLIS, INC. JACKSON'S LAST WORKDAY WITH NURSEFINDER'S HOME HEALTHCARE WAS 1-28-2012.

ON 4-10-2012 I DETECTIVE DODSON LOCATED KIMBERLY JACKSON AT HER HOME LOCATED AT 7325 E. 53RD STREET AND ARRESTED HER ON A SEPARATE UNRELATED CASE DP110140764. MS. JACKSON WAS THEN TRANSPORTED BACK TO THE ORGANIZED CRIME OFFICE WHERE SHE WAS MIRANDIZED BY ME AND SHE WAIVED HER RIGHTS AND AGREED TO GIVE ME A STATEMENT. DURING HER STATEMENT I SHOWED HER KATE REEDER'S STOLEN PNC BANK CHECK #710 DATED 2-4-2012 IN THE AMOUNT OF \$38.38 WITH PAID TO THE ORDER OF DONATOS PIZZA. THE CHECK ALSO HAD ROUTING NUMBER 071921891, AND ACCOUNT NUMBER 4620XX9141 WITH A FORGED SIGNATURE IN THE NAME OF KATE REEDER ON THE SIGNATURE LINE. THE DLN# WRITTEN ON THE CHECK WAS #5364991417, WHICH WAS NOT A VALID INDIANA DLN. MS. JACKSON STATED THAT SHE HAD STOLEN THE PNC BANK CHECK #710 FROM MS. REEDER'S RESIDENCE AND USED IT TO PURCHASE FOOD FOR SHE AND HER DAUGHTER FROM DONATOS. SHE STATED THAT THE PIZZA WAS DELIVERED TO HER HOME ON 53RD STREET AND THAT SHE WROTE THE FRAUDULENT DLN ON THE TOP OF THE CHECK. KIMBERLY JACKSON WAS ARRESTED FOR FORGERY AND

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.


AFFIANT

DATED:  APRIL 11, 2012

DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT

JUDGE

Affidavit for Probable Cause

From: GUSTAVIA DODSON

THEFT AND TRANSPORTED TO THE APC BLDG BY THE WAGON.

ON 4-12-2012 I DET DODSON MET WITH MS. REEDER AT HER HOME AND SHOWED HER A PHOTO ARRAY OF 6 FEMALES. SHE IDENTIFIED PERSON #5 AS KIMBERLY E. JACKSON, PERSON #6 IS KIMBERLY JACKSON AND IDENTIFIED FROM HER INDIANA BMV DL PHOTO.

ALL THE ABOVE OCCURRED IN INDIANAPOLIS MARION COUNTY INDIANA.

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

DATED: APRIL 11, 2012


DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT


AFFIANT

JUDGE

AFFIDAVIT FOR PROBABLE CAUSE

STATE OF INDIANA, COUNTY OF MARION, SS:

GUSTAVIA DODSON swears (affirms) that:

ON 9/29/2011 DELORES J JONES MADE A REPORT OVER THE TELEPHONE. SHE STATED THAT SHE WAS CONTACTED BY JCPENNEYS AND THEY SAID THE ORDER WAS GOING TO BE SHIPPED TO ANOTHER LOCATION. JCPENNEYS STATED THEY HAD NOT EVER NOTICED HER SENDING AN ORDER TO ANOTHER LOCATION. ON 9/22/2011 SOMEONE ATTEMPTED TO OPEN A ACCOUNT IN HER NAME USING HER NAME AND ALL HER PERSONAL INFORMATION. THEY WANTED THE ORDER SHIPPED TO NEW BETHELM, PA TO A NANCY SIMPSON OF BOYS CLOTHING. THE LOCATION WAS CHANGED TO 7343 PARKSIDE DR WHICH IS A VACANT HOUSE. JC PENNEY, COLBY 1-866-831-1528 IS THE CONTACT PERSON AT JCPENNEY'S, REFERENCE FRAUD #2011271541099560. SOMEONE ALSO ATTEMPTED TO OPEN A ACCOUNT WITH AMERICAN EAGLE AND IT WAS DECLINED. THERE WAS A WALMART DISCOVERY ACCOUNT OPEN AND A \$11.00 PURCHASE AND ANOTHER \$426.00 PURCHASE FAILED. DELORES AND HER DAUGHTER LAURA STATED THEY ARE USING HER PRIOR ADDRESS 702 DEBRA LN WHERE SHE DOESN'T LIVE. SOMEONE ATTEMPTED TO OPEN A CREDIT CARD FROM FIFTH THIRD BANK. COURTNEY IS THE REPRESENTATIVE FROM FIFTH THIRD BANK 1-800-782-0279. THERE WAS A CLAIM MADE WITH TRANS UNION CASE #243-756744. THE JCP CARD ENDED WITH 8373.

ON 10-24-2011 I DETECTIVE DODSON WAS ASSIGNED TO THIS CASE TO INVESTIGATE. DURING THE COURSE OF MY INVESTIGATION I RECEIVED NUMEROUS BANK STATEMENTS AND CREDIT CARD DOCUMENTS FROM THE VICTIM'S DAUGHTER. IN THE BANK DOCUMENTS IT SHOWS VARIOUS UNAUTHORIZED CHECK TRANSACTIONS AND DEBIT/CREDIT CARD TRANSACTIONS FROM CHARLES JONES CHECKING ACCOUNT WITH CHASE BANK 199XX1794 AND DELORES JONES' 5/3RD BANK CARD# 5292-XXXX-XXXX-4914. I WAS ALSO INFORMED THAT NUMEROUS ATTEMPTS WERE MADE TO OBTAIN A LINE OF CREDIT WITH VARIOUS CREDIT CARD COMPANIES WITHOUT THEIR AUTHORIZATION. ALSO, THEIR SEVERELY HANDICAPPED DAUGHTER LINDA JONES' PERSONAL INFORMATION HAS BEEN COMPROMISED AS WELL WITHOUT HER PERMISSION. I WAS ALSO NOTIFIED THAT SOMEONE HAD USED CHARLES JONES' CHECKING ACCOUNT INFORMATION ON 12-7-2012 TO PAY THEIR IPL BILL IN THE AMOUNT OF \$119.07 FOR THE RESIDENCE LOCATED AT 7325 E 53RD STREET.

DURING THE COURSE OF MY INVESTIGATION IT WAS SUSPECTED THAT A HOME HEALTHCARE NURSE EMPLOYED THROUGHT MAXIM HEALTHCARE THAT RENDER SERVICES FOR LINDA JONES W/F/55 MAY HAVE BEEN THE PERSON THAT OBTAINED THE VICTIM'S PERSONAL INFORMATION FROM THEIR RESIDENCE LOCATED AT 702 DEBRA LANE. I RECEIVED A LIST OF MAXIM EMPLOYEE'S ALONG WITH THEIR ADDRESS AND PHONE
I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

DATED: APRIL 11, 2012

DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT


AFFIANT

JUDGE

Affidavit for Probable Cause

From: GUSTAVIA DODSON

NUMBER'S FROM R. LENTZ THAT HAD BEEN ASSIGNED TO 702 DEBRA LANE WITHIN THE PAST YEAR. I NOTICED THAT EMPLOYEE KIMBERLY JACKSON LIVED DOWN THE STREET FROM WHERE CERTAIN FRAUDULENT DELIVER'S WERE ATTEMPTED, AND A STREET OVER FROM WHERE SOME DELIVERIES WERE SUCCESSFULLY MADE. I SPOKE WITH U.S. POSTAL MAIL CARRIER KATHY WALDEN (ROUTE #40) FOR THE AREA AND SHE STATED THAT SHE HAS LEFT 2 PARCEL PRIORITY PACKAGES AT THE VACANT RESIDENCE LOCATED AT 7343 PARKSIDE DRIVE FOR KIMBERLY JACKSON. SHE ALSO STATED THAT KIMBERLY CALLED HER SUPERVISOR "SCOTT" TO FIND OUT WHY ONLY 2 OUT OF 3 PACKAGES WERE DELIVERED, AND THAT SHE HAD SPOKEN WITH HER OVER THE PHONE ABOUT THE DELIVERIES, HOWEVER SHE HAS NEVER SEEN HER FACE TO FACE.

FOR DELORES JONES W/F/76 CREDIT CARD APPLICATIONS WERE COMPLETED IN ORDER TO OBTAIN A LINE OF CREDIT BY USING DELORES JONES' SSN FOR AMERICAN EXPRESS (ENDING IN 61001), HOME DEPOT (ENDING IN 9144) , WALMART DISCOVER (ENDING IN 7397), ASHLEY STEWARDS (ENDING IN 1460), FINGERHUT(DENIAL), FIRST PREMIER BANK CARD (DENIED). FROM SEPTEMBER 27, 2011 TO NOVEMBER 9, 2011 (8) UNAUTHORIZED WEB

INITIATED AMAZON PURCHASES WERE MADE FROM DELORES JONES' 5/3RD CHECKING ACCOUNT ENDING WITH #3202 TOTALING \$ 657.51. ALSO, (6) UNAUTHORIZED PURCHASES MADE FROM 5/3RD USING THE MASTERCARD ENDING WITH #4914 FOR PURCHASES FROM DONATOS PIZZA BETWEEN 9-25-2011 AND 10-21-2011 TOTALING \$236.02. A COMCAST BILL IN THE AMOUNT OF \$50.00 WAS ALSO PAID OFF OF DELORES' JONES MASTERCARD ACCOUNT ON 9-25-2011 WITHOUT HER AUTHORIZATION.

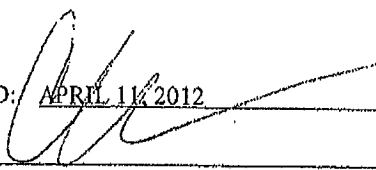
FOR CHARLES JONES W/M/78 UNAUTHORIZED CREDIT CARD APPLICATIONS WERE COMPLETED IN ORDER TO OBTAIN A LINE OF CREDIT FOR HSBC BY USING HIS SSN TO OBTAIN A CREDIT CARD FROM 5/3RD OPTIMUM MASTERCARD (DENIED). ALSO A SECOND CREDIT CARD APPLICATION FOR CHARLES JONES WAS DENIED FOR A PLATINUM MASTERCARD ON 12-1-2011. HOWEVER ON 12-6-2011 HIS CHECKING ACCOUNT ENDING IN #1794 WAS COMPROMISED TO MAKE AN ACH DEBIT PAYMENT FOR AN IPL BILL IN THE AMOUNT OF \$119.07. THAT PAYMENT WAS FOR IPL ACCOUNT #1542532 FOR THE ADDRESS OF 7325 E. 53RD STREET. FOR MAXIM HEALTHCARE CLIENT LINDA JONES W/F/55, UNAUTHORIZED USAGES OF HER SSN WAS USED TO APPLY FOR A LINE OF CREDIT THROUGH WELLS FARGO WITH THE ACCOUNT NUMBER ENGING IN #9510 ON OR ABOUT SEPTEMBER 20, 2011 WHICH WAS ADDRESSED TO THE LOCATION OF 7372 E. 53RD STREET.

FROM MY INVESTIGATION I WAS ABLE TO DETERMINE THAT KIMBERLY JACKSON B/F/27 DOB: 7-16-84 WAS THE PERSON THAT HAD STOLEN LINDA, DELORES, AND CHARLES JONES' IDENTITY AND HAD MADE NUMEROUS PURCHASES FROM THEIR CHECKING ACCOUNT AND CREDIT CARD ACCOUNT WITHOUT THEIR PERMISSION. KIMBERLY JACKSON WAS ALSO

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.


AFFIANT

DATED: APRIL 11, 2012


DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT

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Affidavit for Probable Cause

From: GUSTAVIA DODSON

EMPLOYED WITH MAXIM HEALTHCARE FROM OCTOBER 15, 2010 TO NOVEMBER 2011. SHE WAS BRIEFLY ASSIGNED TO LINDA JONES AT 702 DEBRA LANE FROM SEPTEMBER 10, 2011 TO SEPT 18, 2011, ON THREE DIFFERENT DAYS.

ON 4-10-2012, I DETECTIVE DODSON ALONG WITH LAWRENCE POLICE OFFICERS APPREHENDED KIMBERLY JACKSON AT 7325 E. 53RD STREET. SHE WAS TRANSPORTED BACK TO THE ORGANIZED CRIME OFFICE FOR AN INTERVIEW. I MIRANDIZED MS. JACKSON AND SHE WAIVED HER RIGHTS AGREED TO GIVING ME A STATEMENT. DURING THAT STATEMENT SHE ADMITTED THAT WHILE SHE WAS WORKING INSIDE LINDA JONES RESIDENCE SHE OBTAIN PERSONAL INFORMATION AS WELL AS BANKING AND CREDIT CARD INFORMATION OFF OF THE DINING ROOM TABLE AND USED THEIR INFORMATION FOR HER OWN PERSONAL GAIN. SHE STATED THAT SHE ATTEMPTED TO OPEN UP CREDIT CARD ACCOUNTS WITHOUT THE VICTIMS PERMISSION. SHE ALSO STATED THAT SHE USED THE VICTIM'S CREDIT CARDS AND CHECKING ACCOUNT INFORMATION TO BUY FOOD AND CLOTHES FOR HER CHILD, AS WELL AS TO PAY BILLS WITH THE CREDIT CARDS. SHE STATED THAT SHE DID PAY HER IPL BILL AS WELL AS HER COMCAST BILL BY USING THE VICTIM'S CHECKING ACCOUNT OR DEBIT CARD. SHE ALSO PURCHASED CLOTHING FROM AMAZON.COM THAT WERE MADE AND DELIVERED TO THE 7343 PARKSIDE ADDRESS. SHE ADMITTED TO ATTEMPTING TO PURCHASE CHILD CLOTHING FROM JCP ON 9-22-2011 HOWEVER SHE NEVER RECEIVED THE DELIVERY. SHE STATED THAT SHE USED DELORES JONES SSN AND ADDRESS WITHOUT HER PERMISSION TO OPEN UP A JCP CREDIT CARD ACCOUNT (6008895363858373) ON 9-22-2011. AND THAT SHE ALSO MADE THE PURCHASES ON THAT DATE. THE PURCHASE WAS FOR A SMALL GIRL'S CLOTHING. JCP FRAUD INVESTIGATOR TERRY KOWASKI FAXED ME A COPY OF THE JCP APPLICATION THAT WAS SUBMITTED TO THEM. DONATO'S PIZZA'S WERE PURCHASED SO THAT SHE AND HER 6 YEAR OLD DAUGHTER COULD EAT. SHE OFTEN USED A COMPUTER TO MAKE THE PURCHASES ONLINE.

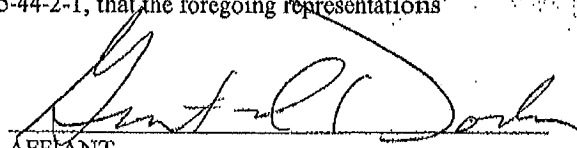
ON 4-10-2012 I SHOWED MAXIM EMPLOYEE BEN DILLON A PHOTO ARRAY AND HE IDENTIFIED PERSON #5 AS THE PAST EMPLOYEE THAT HE KNOWS AS KIMBERLY JACKSON.

I ALSO SHOWED MAXIM EMPLOYEE KEVIN SULLIVAN A PHOTO ARRAY AND HE ALSO IDENTIFIED PERSON #5 AS KIMBERLY JACKSON. I THEN SHOWED MR. CHARLES JONES GRANDSON STUART DUVALL-JONES A PHOTO ARRAY AND HE IDENTIFIED PERSON #5 AS THE MAXIM HOME HEALTHCARE WORKER THAT WAS IN HIS AUNT LINDA'S HOME IN SEPTEMBER 2011. DELORES JONES AND CHARLES JONES WERE UNABLE TO IDENTIFY KIMBERLY JACKSON. PERSON #5 HAS BEEN IDENTIFIED AS KIMBERLY E. JACKSON FROM HER BMV PHOTO #5340-14-7364. KIMBERLY JACKSON WAS ARRESTED ON NUMEROUS THEFT, FRAUD, AND IDENTITY THEFT CHARGES AND TRANSPORTED TO THE APC BLDG FOR PROCESSING. HER DAUGHTER K. JACKSON B/F/6 WAS CHINSED AND RELEASED TO CPS WORKER ALICE HOUSTON.

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

DATED: APRIL 11, 2012

DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT


AFFIANT

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ALL THE ABOVE OCCURRED IN INDIANAPOLIS MARION COUNTY INDIANA.

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.


AFFIANT

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